

**To:** Owens, Kim[Owens.Kim@epa.gov]  
**Cc:** Steiner-Riley, Cara[Steiner-Riley.Cara@epa.gov]  
**From:** Iani, L. John (Perkins Coie)  
**Sent:** Tue 3/18/2014 11:11:31 PM  
**Subject:** RE: March 26th Meeting

Thanks Kim. Understand you are busy. We wanted to discuss the potential issues that could arise out of the challenge to the new exploration GPs, not the draft geotech GP. Shell will not be working in 2014 under either permit but needs to understand, clearly, what permit coverage might be available in 2015 depending upon the uncertainty surrounded by the challenge. We certainly understand the rigors of the administrative record.

Again, we understand that you have other matters.

John

**From:** Owens, Kim [mailto:Owens.Kim@epa.gov]  
**Sent:** Tuesday, March 18, 2014 3:52 PM  
**To:** Iani, L. John (Perkins Coie)  
**Cc:** Steiner-Riley, Cara  
**Subject:** Re: March 26th Meeting

Hello John,

I am in the office today, but have been tied up on another matter. I'm not sure I understand the purpose of a pre-meeting discussion among attorneys only. I've reviewed Shell's detailed written comments on the geotechnical permit, dated February 19, 2014. I've also been briefed on the comments and concerns that Shell raised with the Director of EPA R10's Office of Water and Watersheds at the meeting in Anchorage on January 10<sup>th</sup>. I'd assumed that Shell has already put its issues on the table. Any new issues that Shell would like EPA to consider in its permitting decision will need to be included in the administrative record.

Also, as I mentioned last week, we are preparing a list of technical questions for Shell that will guide the discussion at next week's meeting and help address areas where technical clarification is needed. We expect that will be sent out shortly. For these reasons, I'm not clear on the purpose of a pre-meeting discussion. I'll be in the office today until 5:30.

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